

22-08/PJG

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

INDUSTRIAL CARRIERS INC.,

Plaintiff,

-against-

DAYTON COMMERCIAL LIMITED a.k.a.
GALVANIZED STEEL CONSUMERS
ASSOCIATION a.k.a. GSCA a.k.a. GSCA
LIMITED a.k.a. TOP UNION,

Defendants.

07 CV 7937 (RMB)

**NOTICE OF RESTRICTED
APPEARANCE PURSUANT TO
ADMIRALTY RULE E(8)**

PLEASE TAKE NOTICE that Freehill Hogan & Mahar, LLP, hereby enters a restricted appearance pursuant to Federal Rules of Civil Procedure Supplemental Admiralty Rule E(8) on behalf of TOP UNION (CHINA) LTD., the party in interest to certain funds under attachment, reserving all defenses available to it including without limitation personal jurisdiction, service and venue.

DATED: New York, New York
March 11, 2008

Respectfully submitted,

FREEHILL HOGAN & MAHAR, LLP
Attorneys for Interested Party
Top Union (China) Limited

By: /s/ Peter J. Gutowski
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CERTIFICATE OF SERVICE

I, PETER J. GUTOWSKI, certify that I am counsel of record for party in interest Top Union (China) Limited. On March 11, 2008, the within Notice of Restricted Appearance was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

_____/s/ Peter J. Gutowski
Peter J. Gutowski

Dated: March 11, 2008